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14 Attorneys for Defendant
15 CHARTWELL STAFFING SERVICES, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 DEMETRIC DI-AZ, OWEN DIAZ and
19 LAMAR PATTERSON,

20 Plaintiffs,

21 vs.

22 TESLA, INC. DBA TESLA
23 MOTORS, INC.; CITISTAFF
24 SOLUTIONS, INC.; WEST VALLEY
25 STAFFING GROUP; CHARTWELL
26 STAFFING SERVICES, INC.; and
27 DOES 1-10, inclusive,

28 Defendants.

CASE NO. 3:17-cv-06748-WHO

**DECLARATION OF
JANNETTE VAN GORKUM IN
SUPPORT OF CHARTWELL
STAFFING SERVICES, INC.'S
MOTION TO COMPEL
ARBITRATION**

Date: February 21, 2018

Time: 2:00 p.m.

Location: Courtroom 2

Judge: Hon. William H. Orrick

Complaint Filed: October 16, 2017

Trial Date: Not Set

DECLARATION OF JANNETTE VAN GORKUM

I, Jannette Van Gorkum hereby declare and state as follows:

1. I hold the position of Regional Human Resources Manager for Defendant Chartwell Staffing Services, Inc. ("Chartwell" or "Defendant"). My responsibilities include providing human resources support to Chartwell's offices and assisting with the implementation of personnel policies and practices. In my position, I have access to the personnel records of the workers that Chartwell

1 places with its clients, including those of Plaintiff Lamar Patterson (“Plaintiff”).
2 The facts set forth herein are based on my own personal knowledge and on
3 Chartwell’s business records. To the extent this declaration is based on business
4 records, those records are kept in the regular course of business, entries are made
5 on those records in a timely manner by people with knowledge of the information
6 being entered, and it is the regular practice of Chartwell’s business to maintain
7 such records. If called to testify, I could and would competently testify to the
8 contents of this declaration.

9 2. I have access to and have reviewed Plaintiff’s personnel records.
10 Plaintiff’s personnel file reflects that Plaintiff signed Chartwell’s stand-alone
11 Arbitration Agreement (“Agreement”) under which he and Chartwell mutually
12 agreed to binding arbitration of any disputes arising from his employment or
13 association with Chartwell. A true and correct copy of the Agreement is attached
14 hereto as **Exhibit C**.

15 I declare under penalty of perjury under the laws of the State of California
16 that the foregoing is true and correct.

17 Executed on January 16, 2018, at Anaheim, California.

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20 Jannette VanGorkum
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